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PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

PETERSON BUILDERS, INC. STURGEON BAY, WISCONSIN WID 096 828 975

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Peterson Builders, Inc. (Peterson) Plant 2 facility in Sturgeon Bay, Door County, Wisconsin (EPA ID No. WID 096 828 975). This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The Peterson facility manufactures boats and ships. The facility was also used to manufacture air transport industry trucks and small fiberglass boats. The facility generates and manages the following waste streams: spent freon 113 (F002); spent freon still bottoms (F002); spent pyridine and methanol mixture (D001, F005 and D038); spent xylene and glycol ether mixture (F003); spent xylene and methyl ethyl ketone mixture (D001, F003, F005, and D035); spent methylene chloride (F002); spent 1,1,1-trichloroethane and toluene mixture (D001, F003, F005 and D035); spent acetone (F003); nonhazardous dibasic esters (DBE) of dimethyl glutonate, dimethyl additate and dimethyl succinate; nonhazardous 1-methyl-2-pyrrolidinone; nonhazardous epoxy washwater; spent petroleum naptha (D001); waste corrosive cleaning solution (D002, D007 and D008); dioctyl phthalate (U028); nonhazardous cutting oil; aluminum dip tank desmutter waste (D002); and wood ash (unknown hazardous characteristics). Plant 1 of Peterson Builders Inc. location at 101 Pennsylvania Street, Sturgeon Bay, Wisconsin has transported hazardous wastes to this facility for container storage.

The facility has operated at its current location since 1965. The facility occupies 20.9 acres in a mixed-use area and employs about 35 people. The facility's current regulatory status is that of a large-quantity generator of hazardous waste. The facility was a hazardous waste treatment, storage, or disposal (TSD) facility before WDNR approved RCRA closure of the facility on March 27, 1992.

This facility has only one owner, except for Building Number 89 which was owned by Seville Organ Company until the early 1970's. The facility leases about 50 percent of Building Number 80 to two companies: (1) Microlift, Inc., a water purification equipment manufacturer and design firm, and (2) Marine Travel Lift, Inc., a boat lift manufacturer. PRC found no SWMUs or AOCs present at either of the lessee's operations.

The PA/VSI identified the following four SWMUs at the facility:

Solid Waste Management Units

1. Hazardous Waste Storage Area (HWSA)
2. Freon Distillation Unit (FDU)
3. Wood Ash Pile (WAP)
4. Satellite Accumulation Area (SAA)

Hazardous wastes are stored in the HWSA (SWMU 1) for less and 90 days. The FDU (SWMU 2) is used for the distillation and recovery of freon 113 (three to five times per year). The WAP (SWMU 3) was used for the open burning of wood and wood pallets. Peterson closed the HWSA (SWMU 1) in 1991, and underwent RCRA clean-closure which was approved by WDNR on March 27, 1992.

The PA/VSI did not identify any AOCs at the facility.

The potential for release from HWSA (SWMU 1), the FDU (SWMU 2), and the SAA (SWMU 4) to ground water, surface water, air and on-site soils is low. Peterson has adequate containment for these three SWMUs. The potential for release from the WAP (SWMU 3) to ground water, surface water, air and on-site soils is unknown. WAP (SWMU 3) is an unlined, wood ash pile sitting on top of a gravel parking lot. There are no release controls for the WAP (SWMU 3) present and the facility has not done any testing on this SWMU.

The City of Sturgeon Bay supplies all water to this facility from city wells. Ground water is used for drinking and industrial water. Ground water flows basically in an easterly direction. The nearest private drinking well is 0.2 mile downgradient and east of the facility. The nearest public water supply well is 0.4 mile upgradient and south of the facility.

Receptors of potential releases at this facility include Peterson personnel, personnel of nearby industries, and local residents. The drainage ditch located northeast of the facility may also be affected by a release from the facility. A residential area lies within 0.1 mile of the facility. The nearest surface water body is Sturgeon Bay, 0.8 mile east.

Sensitive environments include wetlands about 0.2 mile east of the facility. This is a broad leaf, forested wetland with Palustine wet soil.

PRC recommends no further action for SWMUs 1 through 4 at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Peterson Builders, Inc. (Peterson), Plant 2 facility in Sturgeon Bay, Wisconsin (EPA ID No. WID 096 828 975). The PA was completed on March 27, 1992. PRC gathered and reviewed information from Wisconsin Department of Natural Resources (WDNR), EPA Region 5 RCRA files, U.S. Geological Survey (USGS), Federal Emergency Management Agency (FEMA), U.S. Fish and Wildlife Service (USFWS), U.S. Department of Agriculture (USDA), and Wisconsin Geological and Natural History Survey (WGNHS). The VSI was conducted on April 22, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. Four SWMUs were identified at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and seven inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The Peterson facility is located at 101 East Walnut Street in Sturgeon Bay, Door County, Wisconsin (latitude 44° 48' 41"N and longitude 87° 22' 44"W), as shown in Figure 1. The facility occupies 20.9 acres in a mixed-use area.

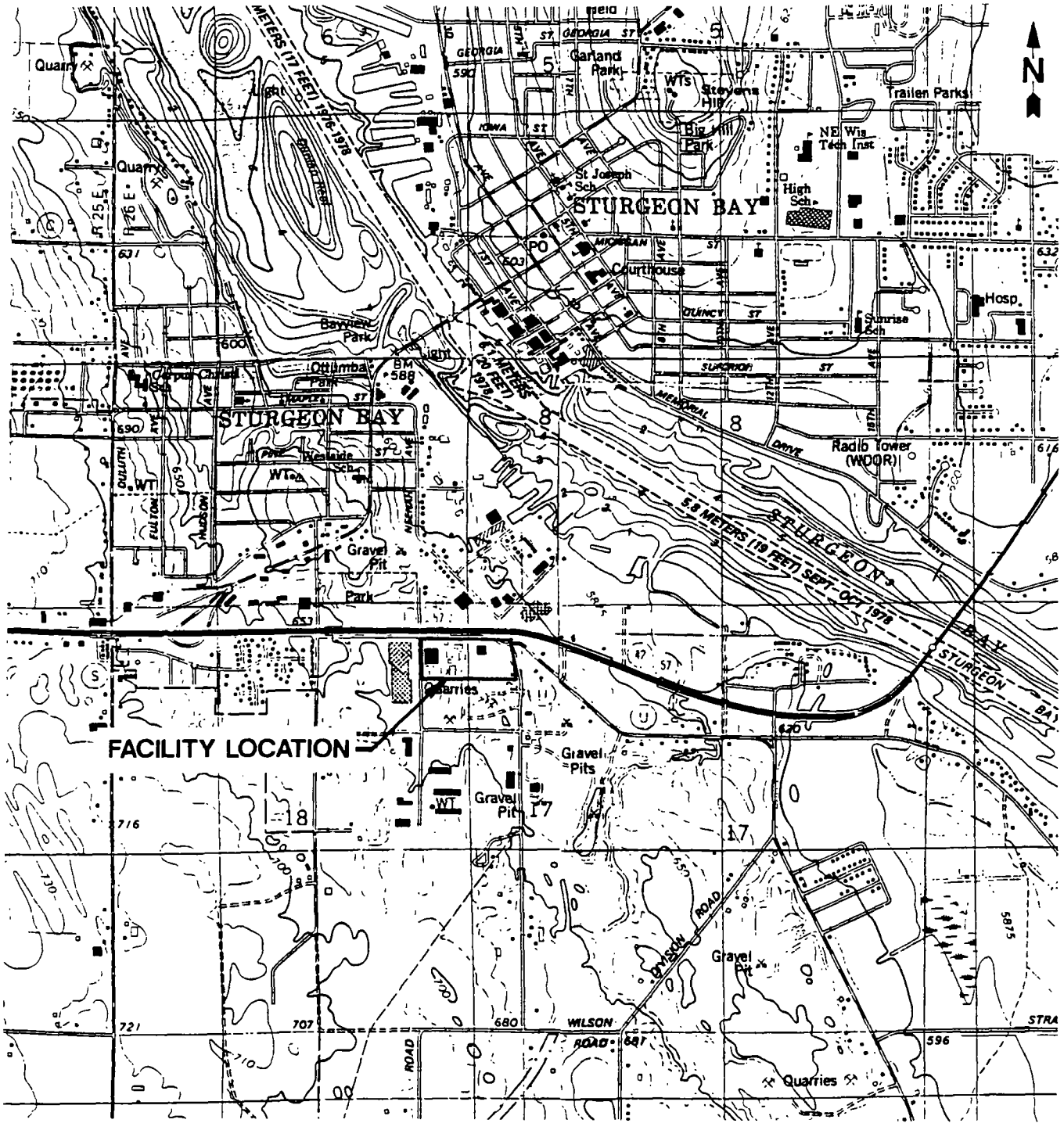
The Peterson facility is bordered on the north by East Walnut Street and Highway 57; on the west by South Neenah Street and Emerson Electric Company, an electrical components manufacturer; on the south by Sturgeon Bay Sand and Gravel Company, a gravel pit and quarry company; and on the east by South Oxford Avenue and a single residence.

2.2 FACILITY OPERATIONS

The Peterson facility has operated at its current location since 1965 and employs approximately 35 people. The facility manufactures boats and ships. The facility was also used to manufacture air transport industry trucks and small fiberglass boats. Raw materials used at the facility include acetone; methyl ethyl ketone; methylene chloride; xylene; toluene; dioctyl phthalate; freon 113; cutting oils; petroleum naphtha; corrosives, including phosphoric acid and fluoboric acid solutions; dibasic esters of dimethyl glutonate; dimethyl additate and dimethyl succinate; 1-methyl-2-pyrrolidinone; aluminum; fiberglass; epoxies; paints; wood; and steel.

Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

Eight buildings make up an area of the site known as Plant 2. Facility manufacturing activities are done in Buildings No. 80 and 85. Building No. 80 is used to store raw materials and contains an aluminum dip tank desmutter used to clean aluminum parts. Building No. 85 is used to manufacture fiberglass vessels and tanks and contains a satellite accumulation area for waste generated at this building. The five other buildings are used to warehouse raw materials (wood, steel, aluminum, moldings, paint, and other chemicals).



SOURCE: MODIFIED FROM USGS, STURGEON BAY EAST AND WEST QUADRANGLE, 1981

PETERSON BUILDERS, INC. PLANT 2
STURGEON BAY, WISCONSIN

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

Building No. 89 is used to store virgin, flammable materials as well as hazardous and solid wastes. The facility also has a bone yard south of Buildings No. 82, 83 and 85, which is used to store metal molds and standardized metal parts and equipment.

The square footage of each building at this facility is as follows: (1) Building No. 80 - 34,200 square feet; (2) Building No. 81 - 9,000 square feet; (3) Building No. 82 - 10,300 square feet; (4) Building No. 83 - 10,000 square feet; (5) Building No. 84 - 12,700 square feet; (6) Building No. 85 - 12,100 square feet; (7) Building No. 89 -12,100 square feet; and (8) Test Building - 500 square feet (Peterson, 1988a).

Building No. 80 was built in 1965 and the other seven buildings were constructed between 1966 and 1975. Building 89 was originally built by Seville Organ Company and sold to Peterson in the early 1970s. About 50 percent of Building No. 80 is leased to two tenants, MicroLift, Inc., a water purification equipment manufacturer and design firm, and Marine Travelift, Inc. (Marine), a manufacturer of boat lifts. Marine uses about 20 percent of Building No. 80 to spray paint boat lifts manufactured at another Marine location. During the VSI, there were no SWMUs or AOCs present at either lessee location.

2.3 WASTE GENERATION AND MANAGEMENT

The primary waste streams generated at the Peterson facility are: (1) freon 113, generated when hoses and pipes are flushed and still bottoms from a freon distillation/recovery unit; (2) spent solvents generated by the facility's quality assurance (QA) laboratory; (3) fiberglass, machinery and parts generated during cleanup; (4) unused fiberglassing chemicals; (5) lubricant used with metal machinery and parts; (6) hazardous waste shipped to the facility from Peterson's Plant 1 facility, also located in Sturgeon Bay, Wisconsin; (7) aluminum dip tank desmutter waste (Photograph No. 4) generated in Building No. 80; and (8) wood ash.

Wastes are generated and managed at various locations at the facility. SWMUs and their current status are identified in Table 1. The locations of SWMUs in relation to the facility layout are shown in Figure 2. Wastes generated at the facility are summarized in Table 2. Facility generation and management of both hazardous and nonhazardous wastes are discussed below.

The flushing of hoses and pipes results in the generation of about 3,675 pounds per year of spent freon 113 (F002). Spent freon 113 is stored in the Hazardous Waste Storage Area (HWSA) (SWMU 1) before it is distilled in the Freon Distillation Unit (FDU) (SWMU 2). Spent freon 113 still bottoms (F002) are generated at the FDU (SWMU 2) and are stored in the Hazardous Waste Storage Area (HWSA) (SWMU 1). About five pounds of spent pyridine and

TABLE 1

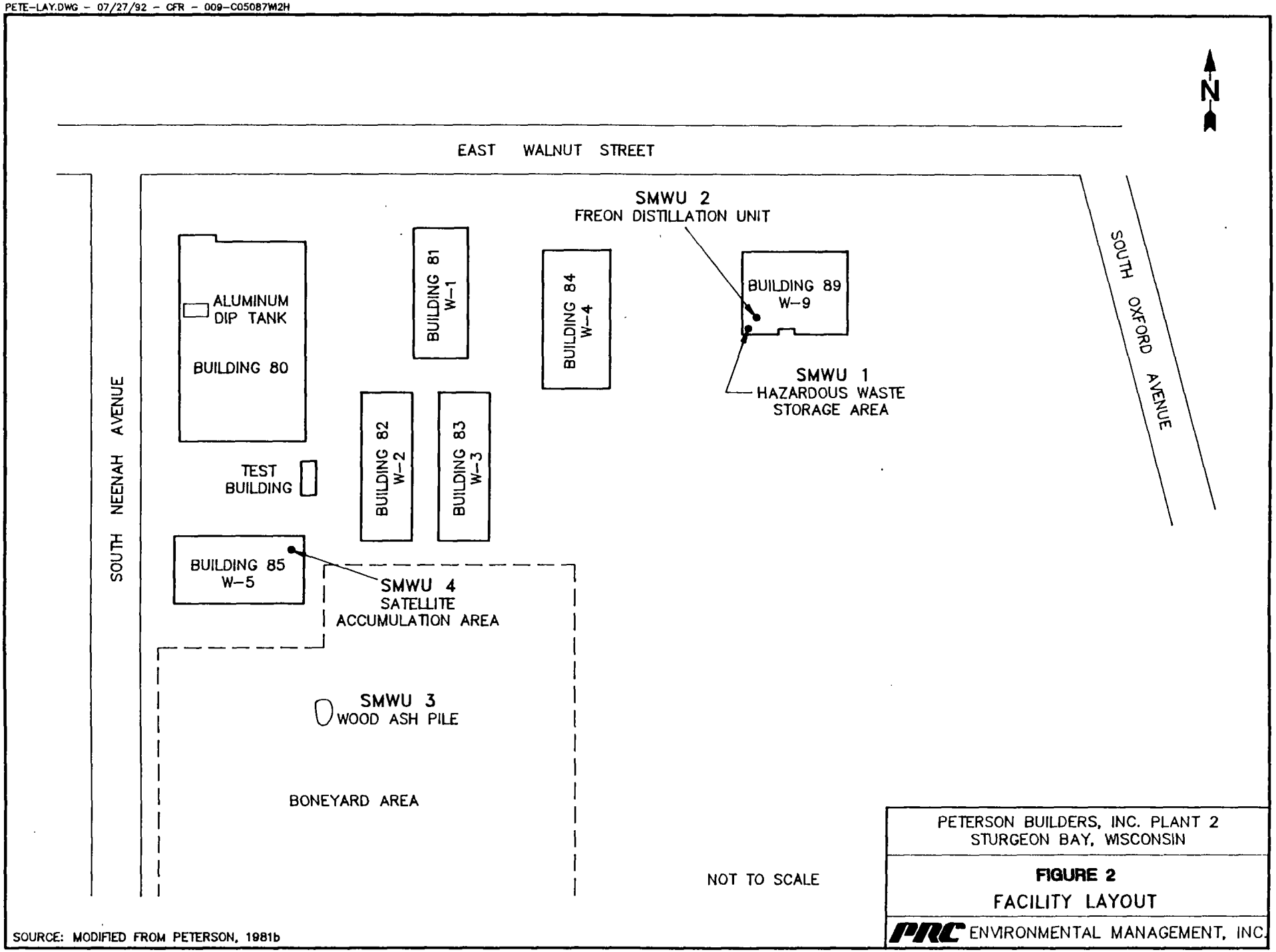
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Hazardous Waste Storage Area (HWSA)	Yes	RCRA clean-closed in 1992, active for less than 90-day storage
2	Freon Distillation Unit (FDU)	No	Active, recycling of hazardous waste
3	Wood Ash Pile (WAP)	No	Active, storage of uncharacterized waste
4	Satellite Accumulation Area (SAA)	No	Active, satellite accumulation of hazardous waste

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

PETE-LAY.DWG - 07/27/92 - CFR - 009-C05087M2H



SOURCE: MODIFIED FROM PETERSON, 1981b

PETERSON BUILDERS, INC. PLANT 2
STURGEON BAY, WISCONSIN

FIGURE 2

FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2
SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Spent freon 113/F002	Hose and pipe cleaning operations	SWMUs 1 and 2
Spent freon still bottoms/F002	Solvent distillation	SWMUs 1 and 2
Spent pyridine and methanol mixture/D001, F005, and D038	QA Laboratory	SWMU 1
Spent xylene and glycol ether mixture/F003	Paint removal cleaning operations	SWMU 1
Spent xylene and methyl ethyl ketone mixture/D001, F003, F005, and D035	Fiberglass equipment cleaning operations	SWMU 1
Spent methylene chloride/F002	Fiberglass equipment cleaning operations	SWMUs 1 and 4
Spent 1,1,1-trichloroethane and toluene mixture/D001, F003, F005, and D035	Fiberglass equipment cleaning operations	SWMU 1
Spent acetone/F003	Fiberglass equipment cleaning operations	SWMU 1
DBE of dimethyl glutonate, dimethyl additate, and dimethyl succinate/NA	Fiberglass equipment cleaning operations	SWMUs 1 and 4
Spent 1-methyl-2-pyrrolidinone/NA	Fiberglass equipment cleaning operations	SWMUs 1 and 4
Spent epoxy washwater/NA	Fiberglass equipment cleaning operations	SWMU 1
Spent petroleum naphtha/D001	New equipment cleaning operations	SWMU 1
Waste corrosive cleaning solution/D002, D007, and D008	Circuit board cleaning operations	SWMU 1
Dioctyl phthalate/U028	Unused chemical	SWMUs 1 and 4
Cutting oil/NA	Lubricating operations	SWMU 1

TABLE 2 (continued)
SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Aluminum dip tank desmutter waste/D002	Dip tank cleaning operations	SWMU 1
Wood ash[b]	Burning of wood	SWMU 3

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

[b] Unknown hazardous characteristics

methane solvent mixture (D001, F005, and, D038) are generated by the facility's QA laboratory annually. This spent solvent mixture is stored in the HWSA (SWMU 1).

The removal of paint from mechanical parts results in the annual generation of 5,060 gallons of spent xylene and glycol ether mixture (F003) and 55 gallons of a spent xylene and methyl ethyl ketone mixture (D001, F003, F005, and D035). Both of these wastes are stored in the HWSA (SWMU 1).

The cleanup of fiberglass resin and equipment used in the manufacturing of fiberglass vessels results in the annual generation of: 10,458 pounds of spent methylene chloride (F002); 55 gallons of a spent 1,1,1-trichloroethane and toluene mixture (D001, F003, F005 and D035); 440 gallons of spent acetone (F003); 50 gallons of nonhazardous dibasic ester (DBE) mixture of dimethyl glutonate, dimethyl additate, and dimethyl succinate; 50 gallons of a spent nonhazardous 1-methyl-2-pyrrolidinone (M-Pyrol); and 55 gallons of spent nonhazardous epoxy washwater. Methylene chloride, DBE, and M-Pyrol are stored at building number 85's Satellite Accumulation Area (SAA) (SWMU 4) and will be stored in the HWSA (SWMU 1) when the drums are full. The other wastes are stored in the HWSA (SWMU 1).

The cleanup and removal of a protective coating on new equipment and parts results in the annual generation of 1,203 gallons of a spent petroleum naphtha (D001) stored in the HWSA (SWMU 1). The cleanup of circuit boards generates about 55 gallons of waste corrosive cleaning solution (D002, D007, and D008) annually which is stored in the (HWSA) (SWMU 1) (Peterson, 1992a, 1992b, and PRC, 1992a).

About 50 gallons of unused off-specification dioctyl phthalate (U028) is generated annually. This waste is accumulated in the SAA (SWMU 4) and is stored in the HWSA (SWMU 1). Lubrication of metal machinery and parts annually generates about 110 gallons of a nonhazardous water-based cutting oil which is stored in the HWSA (SWMU 1). In addition to the wastes generated at this facility, Peterson's Plant 1 has shipped the same types of solid and hazardous waste to the HWSA (SWMU 1) for storage (Peterson, 1992a and 1992b). The Plant 1 facility is located at 101 Pennsylvania Street, Sturgeon Bay, Wisconsin, (EPA ID No. WID 006 139 349).

Aluminum dip tank desmutter waste (D002) is generated every 2 to 3 years when the tank is cleaned. About 600 gallons of desmutter waste (phosphoric acid and water) was generated by the facility in 1990. This liquid corrosive waste was stored in the HWSA (SWMU 1). Between December 1990 and November 1991, the desmutter process was not in operation. In November

1991, the facility replaced the phosphoric acid and water solution from the desmutter process with fluoboric acid and water (Peterson, 1992b and PRC, 1992a).

Wood ash is generated when wood and wood pallets are burned in the bone yard. The hazardous characteristics of the wood ash is unknown. Raw materials and metal moldings are stored in the bone yard (see Photograph No. 7).

Wastes are transferred off site by Avganic Industries, Inc.; E&K Hazardous Wastes, Inc.; Laidlaw Environmental Services of Illinois, Inc.; and Safety-Kleen Corporation. All wastes are shipped off site to Avganic Industries, Inc. in Cottage Grove, Wisconsin; Laidlaw Environmental Services of Illinois, Inc., in Pecatonica, Illinois; Chem Central, Inc., in Chicago, Illinois; Ensco, Inc., in El Dorado, Arkansas; and Safety-Kleen Corporation, in Kaukauna, Wisconsin (Peterson, 1992a and 1992b).

2.4 HISTORY OF DOCUMENTED RELEASES

There are no documented releases to environmental media at this facility.

2.5 REGULATORY HISTORY

Peterson submitted a Notification of Hazardous Waste Activity form to EPA on November 19, 1980 (Peterson, 1980). The facility submitted a RCRA Part A permit application on July 23, 1981 (Peterson, 1981a). Container storage (S01) was the only process code listed. The process design capacity was specified as 11,000 gallons. Spent solvents (F005) were the only wastes listed. The facility submitted revisions to the RCRA Part A permit application on November 4, 1981 (Peterson, 1981b) and April 20, 1983 (Peterson, 1983a).

In early 1982, the facility received an EPA Administrative Complaint for failing to submit a timely RCRA Part A permit application. On July 27, 1982, the facility signed an EPA consent agreement and final order for failing to submit the RCRA Part A permit application (EPA, 1982).

The facility was issued a WDNR interim hazardous waste license on May 9, 1983 (WDNR, 1983a). A RCRA Part B permit application was submitted in 1983 and approved by EPA and WDNR in 1984 (Peterson, 1983b, and EPA, 1987). The facility requested a RCRA Part B permit modification in 1985 (Peterson, 1985) and was granted approval to the modification in 1986 (EPA, 1986). Between 1986 and 1988 the facility operated under a 2 year hazardous waste operating license issued by the EPA and WDNR. The facility was issued a one-year hazardous

waste operating license by WDNR effective September 30, 1988 (WDNR, 1988a) which was last reissued in 1991 by WDNR for two more years.

The facility sent a Notification of Hazardous Waste Activity to EPA in December 1983 listing another facility location as the "corner of Walnut and Lansing" under the EPA identification number WID 980 898 399. On August 29, 1988, the facility sent a letter to EPA requesting that this EPA identification number WID 980 898 399 be deactivated because this number and the facility location were contiguous with the facility's generator identification number WID 096 828 975 (Peterson, 1988b). Generator identification number WID 980 898 399 was deactivated by EPA in 1991 (EPA, 1991).

On April 23, 1991, Peterson submitted a letter notifying WDNR of its intent to close this hazardous waste storage facility located at 107 East Walnut Street (generator identification number WID 096 828 975) (Peterson, 1991a). WDNR approved RCRA-clean closure on March 27, 1992 (WDNR, 1992). The facility is currently a large-quantity generator for less than 90-day storage of hazardous wastes (PRC, 1992b).

In the past, the facility has violated RCRA regulations. On ten different occasions WDNR inspections resulted in notices of noncompliance or notices of violation for financial responsibility, closure plans, training, inadequate drum labeling, contingency plan, waste determination, and annual reporting deficiencies (WDNR, 1983b, 1983c, 1983d, 1985, 1986, 1987a, 1987b, 1988b, 1988c, and 1991).

The facility closed the HWSA (SWMU 1) in 1991 (Peterson, 1991b). WDNR approved the RCRA-clean closure of HWSA (SWMU 1) on March 27, 1992 (WDNR, 1992). The facility currently operates as a large-quantity generator storing wastes for less than 90 days.

The facility was issued findings of fact, and conclusions of law and order stating that Peterson must use the latest available control techniques for styrene air emissions and cannot exceed 126.5 pounds of styrene per hour (WDNR, 1989). As long as the facility does not exceed 126.5 pounds of styrene per hour, an air permit is not required. The facility has no history of odor complaints from area residents.

The facility is required to have a Wisconsin Pollutant Discharge Elimination System (WPDES) permit for runoff. Peterson submitted a stormwater application for WPDES permit in late 1991 (Peterson, 1992b). The facility does not have any sanitary sewer pretreatment discharge permits.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Peterson facility.

2.6.1 Climate

The climate in Door County is continental. The lowest average daily temperature is 10.2°F in February. The highest average daily temperature is 80.1°F in July.

The total annual precipitation for the county is 27.20 inches. The 1-year, 24-hour maximum rainfall is 4.57 inches (USDA, 1978). The mean annual lake evaporation rate is 26 inches (U.S. Department of Commerce, 1968).

The prevailing winds are from the northwest and southwest except in early spring when northeast winds are predominant (USDA, 1978).

2.6.2 Flood Plain and Surface Water

The Peterson facility is not located in a flood plain (FEMA, 1991). The nearest surface water body, Sturgeon Bay, is located 0.8 mile east of the facility and is used for recreational, industrial, and municipal purposes. This surface water body is connected to Green Bay on the west and Lake Michigan on the east.

Surface water drainage at the facility is to the east toward Sturgeon Bay. The facility is level and drainage is probably minimal. There is a quarry immediately south and adjacent to the facility. This quarry has a drainage ditch that flows east toward Sturgeon Bay.

Green Bay is located about 5.7 miles west of the facility and Lake Michigan is about 3.5 miles east of the facility (USGS, 1981). The nearest wetland is located about 0.2 mile east of the facility (USFWS, 1987).

2.6.3 Geology and Soils

Soils at the facility are classified by the USDA as Longrie. The upper 3 inches are black loam. The subsurface soil is a dark grayish brown, sandy loam that is about 2 inches thick (USDA, 1978).

Bedrock occurs immediately beneath glacial deposits and clay (60 feet to 428 feet below ground surface). The bedrock is Silurian-age undifferentiated dolomite. Well logs in the area contain confirming descriptions of glacial deposits and clay underlain by gray dolomite (WGNHS, 1992).

Ordovician-age formations underlie the Silurian-age undifferentiated dolomite. The uppermost or Ordovician-age formation is Maquoketa Shale, an aquitard, which is about 420 feet thick. This unit is underlain by the Sinnippee Group, consisting of Galena, Decorah Formation, and Platteville Formation dolomites. The Sinnippee Group is about 200 feet thick. Underlying the Sinnippee Group is the St. Peter Sandstone. The St. Peter Formation is about 180 feet thick and is the most commonly used sandstone aquifer. The Prairie Du Chien Formation, which is about 100 feet thick and underlies the St. Peter Formation, is commonly used in combination with the sandstone aquifer.

A Cambrian sandstone formation, undifferentiated, up to 240 feet thick, underlies the Prairie Du Chien formation. Cambrian sandstone formations do not yield much water. The Cambrian sandstone formations are underlain by the Precambrian-age crystalline rock, consisting mainly of quartzite (USDA, 1978 and USGS, 1973).

2.6.4 Ground Water

There are three major sources of ground water in Door County. These sources include the glacial sand and gravel aquifer; Niagara dolomite aquifer; and the Ordovician and Cambrian Sandstone (Sandstone) aquifer, which includes St. Peter and Prairie Du Chien Group sandstone. The glacial sand and gravel aquifer well depths range from 60 to 428 feet. The Niagara dolomite aquifer well depths range from 75 to 300 feet, and the Sandstone aquifer well depths range from about 1,000 to 1,800 feet below ground surface.

Ground-water movement is basically from west to east towards Lake Michigan for all three aquifers (USGS, 1973). Local well logs for locations within 2.0 miles of the facility show that ground-water levels range from 16 to 38 feet below ground surface. Three local wells within 2.0 miles were drilled into the dolomite formation. These well logs indicate the presence of topsoil and glacial till from 0 to 60 feet, and dolomite from 60 feet to the bottom of the wells which range from 249 feet to 428 feet (WGNHS, 1992).

2.7 RECEPTORS

The facility occupies 20.9 acres in a mixed-use area in Sturgeon Bay, Wisconsin. Sturgeon Bay has a population of about 9,200.

The facility is bordered on the north by East Walnut Street and Highway 57; on the west by South Neenah Street and Emerson Electric Company, an electrical components manufacturer; on the south by Sturgeon Bay Sand and Gravel Company, a gravel pit and quarry company; and on the east by South Oxford Street and a residence located about 0.2 mile east of the facility. The nearest school, Westside School, is located about 0.5 mile north of the facility. Facility access is controlled by locking each building at the end of the work day. The bone yard area south of Buildings No. 82, 83, and 85 is controlled by a chain-link fence with a locked gate.

The nearest surface water body, Sturgeon Bay, is 0.8 mile east of the facility and is used for recreational, industrial, and municipal purposes. Other surface water bodies in the area include Green Bay, located 7.0 miles west of the facility, and Lake Michigan, located 3.5 miles to the east of the facility.

Ground water is used as a drinking and industrial water supply in the area. Water for the facility is supplied by the City of Sturgeon Bay's ground water wells. The nearest private drinking water well is 0.2 mile downgradient and east of the facility. The nearest public water well supply is 0.4 mile upgradient and south of the facility. There are no known industrial water wells located within 2.0 miles of the facility.

Sensitive environments are not located on site. The nearest wetland area is located 0.2 mile east of the facility. This is a broad-leaf, forested wetland with Palustine wet soil.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the four SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC observations. Figure 2 shows the SWMU locations.

SWMU 1 **Hazardous Waste Storage Area (HWSA)**

Unit Description: The HWSA is located indoors and above ground in Building No. 89. The unit is used to store drums of hazardous and solid wastes generated by Plant 2 and drums sent from Plant 1. These drums are stored for less than 90 days. The unit measures 43 feet by 24 feet. The unit is made of a sunken concrete floor. The walls and ceiling are made of steel and aluminum. There are no floor drains in this area (see Photographs No. 1 and 2).

Date of Startup: This unit began operation in 1978.

Date of Closure: The facility underwent RCRA closure on March 27, 1992, and is active for less than 90-day storage.

Wastes Managed: This unit manages hazardous and nonhazardous wastes including spent freon 113 (F002); spent freon 113 still bottoms (F002); spent pyridine and methanol mixture (D001, F005, and D038); spent xylene and glycol ether mixture (F003); spent xylene and methyl ethyl ketone mixture (D001, F003, F005, and D035); spent methylene chloride (F002); spent 1,1,1-trichloroethane and toluene mixture (D001, F003, F005, and D035); spent acetone (F003); nonhazardous DBE of dimethyl glutonate, dimethyl additate, and dimethyl succinate; nonhazardous 1-methyl-2-pyrrolidinone; nonhazardous spent epoxy washwater; spent petroleum naphtha (D001); waste corrosive cleaning solution/D002, D007, and D008; dioctyl phthalate (U028); nonhazardous cutting oil; and aluminum dip tank desmutter (D002). These wastes are stored in 55-gallon drums. Wastes from this unit are ultimately sent off site for disposal.

Release Controls:	The unit has a bermed, concrete barrier that surrounds its outside edge. There is a sprinkler system built into the ceiling, and the concrete floor is sealed with epoxy.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	During the VSI, the unit contained flammable raw materials used in manufacturing operations as well as one drum of spent methylene chloride (F002), one drum of circuit board cleaner (D002, D007 and D008), one drum of nonhazardous epoxy washwater, and two drums of nonhazardous water based cutting oil. There are no visible cracks in the concrete. This unit appears to have sound containment. No evidence of release was noted.
SWMU 2	**Freon Distillation Unit (FDU)**
Unit Description:	The FDU is located in Building No. 89, adjacent to the HWSA. It is above ground and indoors. The unit is used for the distillation and reclamation of freon 113 (F002). The unit measures about 5.5 feet high and 8 feet wide. The unit is made of a metal distillation unit with vapor controls (see Photographs No. 1 and 3).
Date of Startup:	This unit began operation in 1983.
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages freon 113 (F002). Freon 113 still bottom wastes (F002) from this unit are stored in the HWSA (SWMU 1).
Release Controls:	This unit has a sprinkler system in place, and a concrete floor sealed with epoxy. There are no floor drains in this area.
History of Documented Releases:	No releases from this SWMU have been documented.

Observations:	During the VSI, the unit contained a freon distillation unit that was not in operation. There were no visible cracks in the concrete. No evidence of release was noted.
SWMU 3	**Wood Ash Pile (WAP)**
Unit Description:	The WAP is located outdoors, above ground, and north of Building Nos. 82, 83, and 85. This unit was used to burn wood and wood pallets. The unit measures about 8 feet by 12 feet. The unit is made of burned wood and ashes on a gravel parking lot. The parking lot is level and drainage is minimal (see Photograph No. 6).
Date of Startup:	This unit began operating about 1983.
Date of Closure:	The unit has been inactive since 1991.
Wastes Managed:	This unit manages burned wood and ash. Wastes are still stored in the unit.
Release Controls:	The unit has no release controls.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	During the VSI, the unit contained snow, ice, mud, wood ash, and debris, overlying a gravel parking lot.
SWMU 4	**Satellite Accumulation Area (SAA)**
Unit Description:	The SAA is located in Building No. 85. It is above ground and indoors. The unit is used for the satellite accumulation of drums of waste generated during the molding of fiberglass vessels and subsequent cleaning operation.
Date of Startup:	This unit began operation in about 1974.
Date of Closure:	The unit is active.

Wastes Managed:	This unit manages spent methylene chloride (F002); nonhazardous DBE esters of dimethyl glutonate, dimethyl addidate and dimethyl succinate, nonhazardous 1-methyl-2-pyrrolidinone, and dioctyl phthalate (U028). All wastes are sent to the HWSA (SWMU 1) for storage and then transported off-site for disposal.
Release Controls:	The unit has an unsealed concrete floor. There are no floor drains in this area.
History of Documented Release:	No releases from this SWMU have been documented.
Observations:	During the VSI, the unit contained one drum of spent methylene chloride (F002), one drum of nonhazardous DBE of dimethyl glutonate, dimethyl additate, and dimethyl succinate, one drum of dioctyl phthalate (U028) and one drum of M-Pyrol. None of the drummed wastes were full. PRC observed no cracks in the concrete and no evidence of release. (see Photograph No. 5).

4.0 AREAS OF CONCERN

PRC did not identify any AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified four SWMUs at the Peterson facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, located at the end of this section, summarizes the SWMUs at the Peterson facility and recommended further actions.

SWMU 1 **Hazardous Waste Storage Area (HWSA)**

Conclusions: This SWMU has adequate containment for spills because it is indoors and has an epoxy sealed, concrete floor. This unit was RCRA closed in 1992, and is active for less than 90-day storage. The unit has an low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action at this time.

SWMU 2 **Freon Distillation Unit (FDU)**

Conclusions: This SWMU was not in use at the time of the VSI and is used irregularly by the facility. It has adequate containment and is indoors. The unit has an low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action at this time.

SWMU 3 **Wood Ash Pile (WAP)**

Conclusions: The unit has a low potential for release to ground water, surface water, air, and on-site soils because the WAP is not RCRA-regulated and is not known to contain hazardous constituents or hazardous wastes.

Recommendations: PRC recommends not further action at this time.

SWMU 4	**Satellite Accumulation Area (SAA)**
Conclusions:	This SWMU has adequate containment for spills because it is indoors and has concrete floors. This unit has a low potential for release to groundwater, surface water, air, and on-site soils.
Recommendations:	PRC recommends no further action for this SWMU at this time.

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Hazardous Waste Storage Area	About 1978 to Present	None	None
2. Freon Distillation Unit	About 1983 to Present	None	None
3. Wood Ash Pile	About 1983 to Present	None	None
4. Satellite Accumulation Area	About 1974 to Present	None	None

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Peterson, 1988a. Hazardous Waste Contingency Plan for Peterson, October 25.

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USGS, 1981. 7.5-Minute Quadrangle Maps, Sturgeon Bay East and West.

WDNR, 1983a. Letter from Douglas Rossberg to Gary Higgens, Peterson, May 9.

WDNR, 1983b. Letter from George Kraft to John Beales, Peterson, February 17.

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WDNR, 1983d. Letter from Donald Johnston to John Beales, Peterson, October 17.

WDNR, 1985. Letter from Donald Johnston to John Beales, Peterson, January 9.

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WDNR, 1987b. Hazardous Waste Compliance Monitoring and Enforcement Summary for Peterson, December 1.

WDNR, 1988a. Letter from Paul Didier to Don Johnston, Peterson, September 27.

WDNR, 1988b. Letter from A. Nichol Mamolou to Don Johnston, Peterson, July 20.

WDNR, 1988c. Letter from A. Nichol Mamolou to Don Johnston, Peterson, August 22.

WDNR, 1989. Findings of Fact, Conclusions of Law and Order for Peterson Builders, Inc., June 12.

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
WI	WID 096 828 975

II. SITE NAME AND LOCATION

01 SITE NAME *(Legal, common, or descriptive name of site)*	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER				
Peterson Builders, Inc.	107 East Walnut Street				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Sturgeon Bay	WI	54325	Door	55029	8
09 COORDINATES: LATITUDE	**LONGITUDE**				
44°48'41" N	87°22'44"W				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*
Take Highway 57 North towards Sturgeon Bay to the corner of Highway 57 and South Oxford Avenue. Turn right (south) to the first intersection, which is East Walnut Street (less than 0.5 blocks south) and turn right to the facility.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
Peterson Builders, Inc.	101 Pennsylvania Street		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Sturgeon Bay	WI	54235	(414) 743-5574
07 OPERATOR *(If known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
Same			
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**

13 TYPE OF OWNERSHIP *(Check one)*
■ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency Name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*
■ A. RCRA 3010 DATE RECEIVED: 11 /19 /80 (MONTH DAY YEAR) ☐ B UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
■ YES DATE 4/22/92
☐ NO

BY *(Check all that apply)*
☐ A. EPA ■ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): PRC Environmental Management, Inc. (PRC)

02 SITE STATUS *(Check one)*
■ A. ACTIVE ☐ B. INACTIVE ☐ C.UNKNOWN

03 YEARS OF OPERATION
1965 (BEGINNING YEAR) | Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Spent freon 113 (F002); spent freon 113 still bottoms; spent pyridine and methanol mixture (D001, F005, and D035); spent xylene mixture (F003); spent methylene chloride (F002); spent 1,1,1-trichloroethane and toulene mixture (D001, F003, F005, and D035); waste corrosive cleaning solution (D002, D007, and D008); dioctyl phthalate (U028); spent petroleum naphtha (D001); spent acetone (F003); and aluminum dip tank desmutter (D002).

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
If a fire occurred, the potential hazards could include a hazardous substance or waste release to air or on-site soils. Residential populations lie within 0.1 mile of the facility.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*
☐ A. HIGH *(Inspection required promptly)* ☐ B MEDIUM *(Inspection required)* ■ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Kurt Whitman		PRC	(414) 821-5894	07/27/92

EPA FORM 2070-12(17-81)

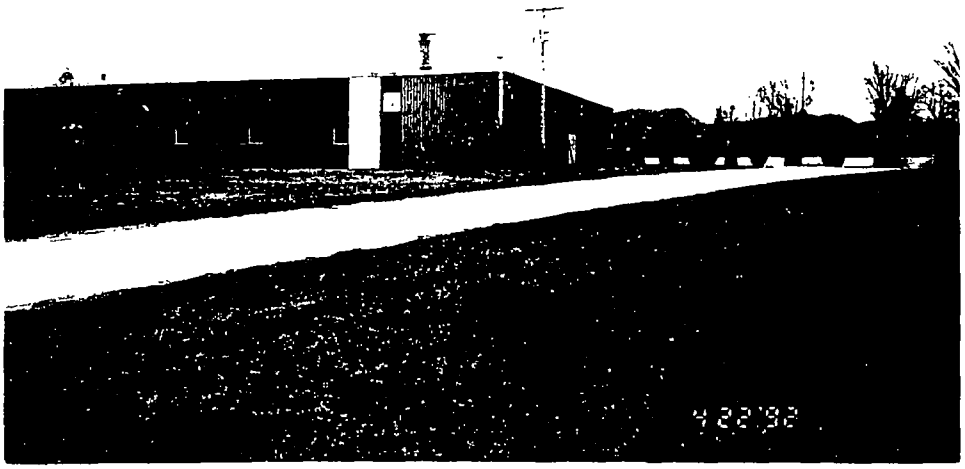
ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Peterson Builders, Inc.
Sturgeon Bay, Wisconsin
WID 096 828 975

Date:	April 22, 1992
Facility Representatives:	Tom Anders, Environmental Manager Rich Propsom, Environmental Engineer
Inspection Team:	Kurt Whitman, PRC Environmental Management, Inc. (PRC) Scott Storlid, PRC
Photographer:	Kurt Whitman
Weather Conditions:	Windy, overcast, temperature about 39°F
Summary of Activities:	The visual site inspection (VSI) began at 12:55 p.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the Peterson facility's past and current operations, solid wastes generated, and release history. Most of the information was exchanged on a question-and-answer basis. Peterson representatives provided the inspection team with copies of the documents requested. The VSI tour began at 1:00 p.m. PRC inspected all areas of the facility. The inspection team observed the Hazardous Waste Storage Area (HWSA) (SWMU 1) located in Building No. 89. The Freon Distillation Unit (FDU) (SWMU 2) is located adjacent to the HWSA (SWMU 1). The FDU was not in operation at the time of the VSI. PRC inspected Building No. 80, where the aluminum dip tank desmutter is located. PRC inspected Building No. 85 and observed four drums of waste stored in the Satellite Accumulation Area (SWMU 4). PRC then observed the Wood Ash Pile (WAP) (SWMU 3). The tour concluded at 2:10 p.m., after which the inspection team held an exit meeting with Peterson representatives. The VSI was completed and the inspection team left the facility at 2:15 p.m.

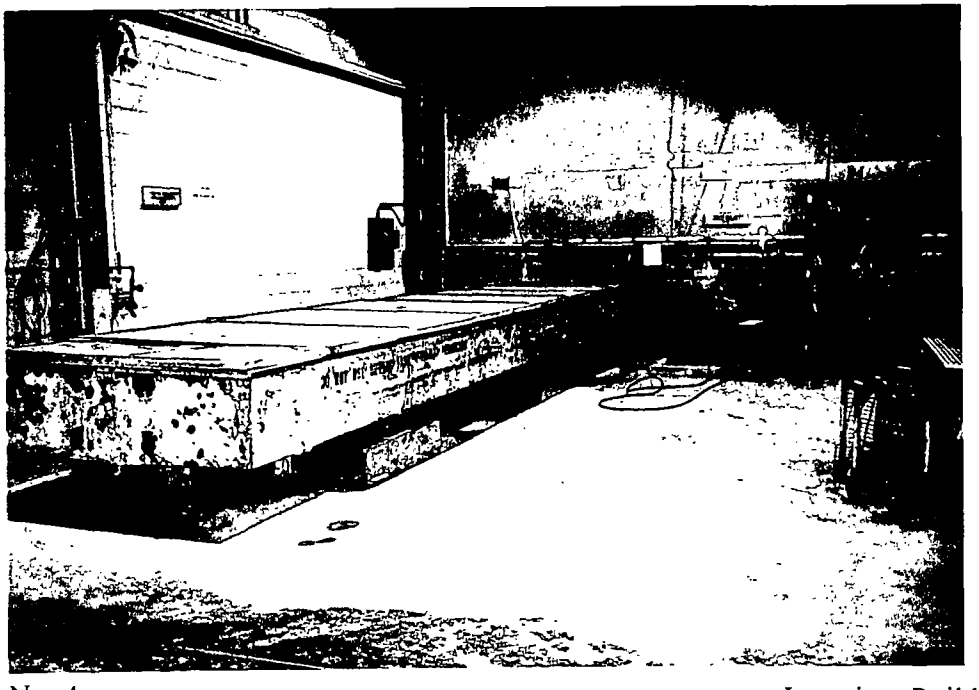


Photograph No. 1 Location: Building No. 89
Orientation: Southeast Date: 04/22/92
Description: This is a photograph of the building that the HWSA (SWMU 1) and FDU (SWMU 2) are located in.

Photograph No. 2 Location: SWMU 1
Orientation: Southwest Date: 04/22/92
Description: This is a photograph of the drums stored in the HWSA (SWMU 1).

Photograph No. 3
Orientation: East
Description: This is a photograph of the FDU (SWMU 2).

Location: SWMU 2
Date: 04/22/92

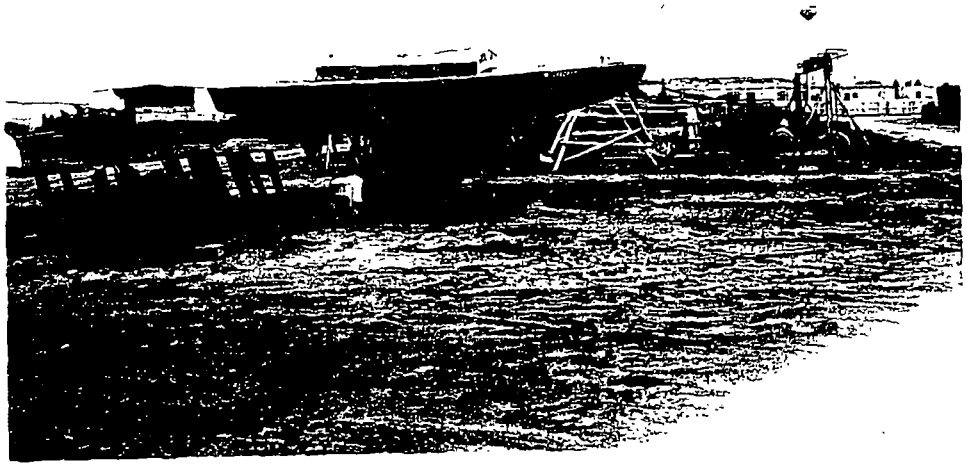


Photograph No. 4
Orientation: Southwest
Description: This is a photograph of the aluminum dip tank desmutter.

Location: Building No. 85
Date: 04/22/92

Photograph No. 5 Location: Building No. 80
Orientation: North Date: 04/22/92
Description: This is a photograph of the satellite accumulation area in Building No. 85.

Photograph No. 6 Location: SWMU 3
Orientation: Southwest Date: 04/22/92
Description: This is a photograph of the wood ash pile.



Photograph No. 7 Location: Bone Yard
Orientation: South Date: 04/22/92
Description: This is a photograph of the bone yard showing all of the equipment and raw materials stored outside.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

4/22/92

PETERSON BUILDERS, INC.

~~WAR~~ WAREHOUSE 9
107 E. WALNUT ST., STURGEON BAY, WI
OVERCAST, INTERMITTENT DRIZZLE
≈ 40°F, WINDS SE 5-10 mph

1228 - arrive at facility, begin observation of adjacent land use
- facility in an mixed use area

1248 - MEET w/
PBI
- RICH PROPSOM, ENV. ENGINEER
- TOM ANDERS, ENV. MNGR.

1250 BEGIN VSI AT WAREHOUSE 9
SITE OF FORMER STORAGE

1251 - VIEW FREON STILL

1258 - VIEWED FORMER STORAGE
1 55-GAL. DRUM
≠ METHYL CHLORIDE
1 DRUM EPOXY WASTE
2 DRUMS CUTTING OIL
- WATER BASED.
- 1 DRUM CIRCUIT BOARD
WASTE WATER - TESTED
HAZARDOUS
- ROOM HAS SEALED CONCRETE FLOOR, CONCRETE BERMED
- THE REST OF WAREHOUSE 9 IS PRODUCT & RAW MATERIAL STORAGE

1313 ENTER PRODUCTION AREA, PLANT 2

- 20.9 Acres, land, warehouse, scrapyards, production facility
- parts of PLANT 2 are leased out to MICROLIFT a water treatment design facility, and MARINE TRAVEL LIFT, painters of fine engines

1316 begin Irving production area.
- manufacture and assembly of fiberglass boat parts
- historically a manufacturer of entire boats, pay-loaders for aircraft carriers.

fiberglass comes in as rolls and is cut, rolled and sent to assembly, no waste from cutting - it is used for patching at other areas,

1325 MICROLIFT.
~~MICROLIFT~~

1330 MARINE TRAVEL LIFT - paint fine engine parts, ~~these~~ waste is managed through store main plant in ST. BAY.

1333 - fiberglass assembly area - WS building

fiberglass comes here, is applied to a frame and epoxy resins ~~or~~ or polyester resins are applied. The pieces are then dried.
wastes from assembly area - methylenchloride, acetone, DBE,
- methylene chloride is used to clean the epoxy guns, so waste is a mix,
- satellite accumulation area - 1 drum M_2C. 1 drum acetone, 1 drum DBE, 1 working drum.

- have an area administrative order.
- no drain in this building, there is a drain in the cutting area
methylene chloride = F001
- waste from Plant 1 is stored at WAREHOUSE 7.

1415 - wrap up interview, no questions.

1416 - leave facility

D.G.D.

S. Whitman

#54

04/22/92

Peterson Builders Inc.
107 East Walnut St.
Sturgeon Bay, Wisconsin
USEPA ID # WID 006 628 975
PRC staff: Kurt Whitman and Scott Starlid

1228 Arrived at Peterson Builders (Peterson).

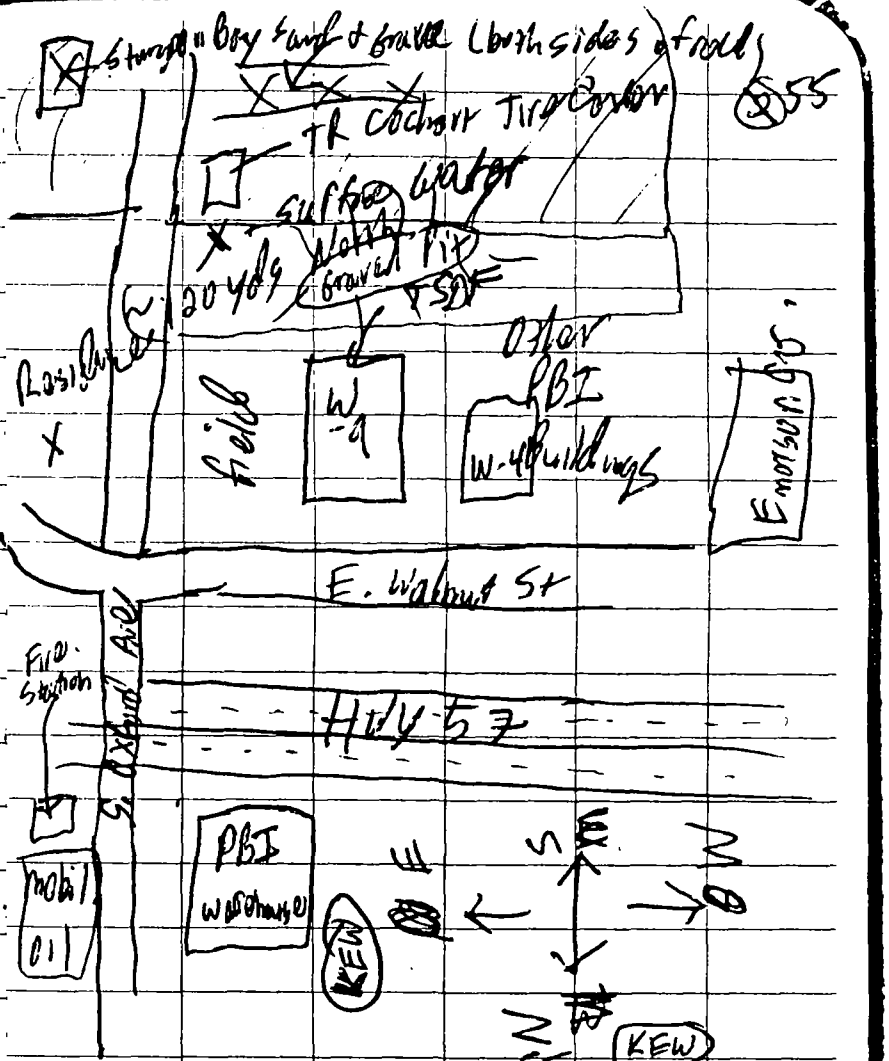
To the west of the facility is E. Walnut St and then Hwy 57 (4 Lane). Across from Hwy 57 is West side Fire Station / Socony Mobil Oil Company oil/fuel storage depot & PBI warehouse on south side

See diagram on next page

To the East is Sturgeon Bay Sand & Gravel.

To the South is Emerson Electric Co.

To the North is a field & Oxford Ave



1239 hrs PIC1 exposure of W-9 warehouse of PBI storage facility S. Whitman

temperature 39°F, winds 5-10 mph from southeast, overcast drizzle

56 (3)

NO visible stains outside of the W-9 warehouse

1255 hrs. Met with facility representative Tom Anders & Rich Propsom

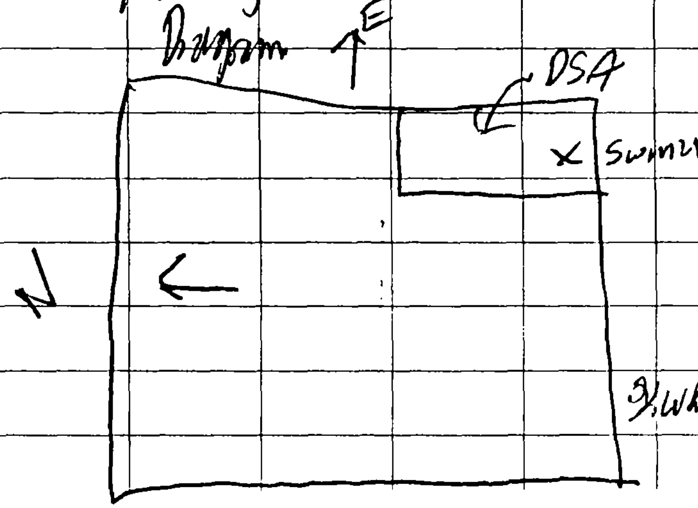
Most of warehouse area is used for product storage of flammables

1300 hrs PIC 2 of Freon still that was used when PBI had a licensed TSDF
TSDF (former)
Epoxy sealed concrete floor
Ventilation in SW corner
1 Drum of methylene chloride (F002)
[signature]

57 (4)

1 drum circuit board cleaner washwater (D002)(D007, D008)
1 drum epoxy washwater waste (non-haz) and 2 drums cutting oil (H2O based) product
Floors sunken. Berm separates TSDF from storage
PIC 3 1302 Picture of 4 drums of waste.
1 drum hazardous & 3 drums non hazardous as indicated above
Sprinkler system. Fire extinguisher
Metal sided bldg. w/ concrete floor. Limited access w/ sliding door on north

Diagram



[signature]

Warehouses
DSA square footage of former TSDF
1313 # of 15 an average of 35 employees
Meeting Plant 2 which also
falls under this ID #
Total of 20.9 acres including
vacant land & bone yard
~~[illegible]~~

Lessors - 1) Microlift - water
purification equipment design (SQG)
2) Marine travel lift.
Spray Paint operation
< 250 gallons of
Paint used. for
fire engines - subcontract
for Pierce Mfg
Marine Travel lift went through an
air paint process and were found
[signature] Whitman

exempt

3 areas of production for
this ID #.
Manufacturing of fiberglass
components and assembly.
Historical perspective is that
they manufacture 30-40'
fiberglass boats & Aircraft
Pay minor manufacturer before
1985, started in 1970's.
Fiberglass comes into facility
in rolls & are cut too size
[illegible] & staged for assembly
in Bldg. 85
Cut wood & assembled aluminum
masts
1322 hrs Fiberglass waste is stored here
for use in patching [illegible].
[signature] Whitman

7 60

1327 Aluminum Dip Tank.
Desmutter using Fluoboric
acid & the PIC 4 taken of
this swing, was
Phosphoric Acid before November
1991. Fluoboric Acid used after
Nov. 1991. Drain (trench)
is next to Desmutter tank
Water piped into the trench.
Scale frozen in trench
1327 PIC 5 of Desmutter trench
w/ residue (off white to
gray)

1328 Microlifts. No sumps or
AUO's observed. They use a
1330 dissolved air flotation equipment

[signature]

8 61

Marine travel lift uses
paints & solvents (Xylene)
Ventilation to outside is
blocked off (north end of bldg.
1334 Also use a misc steam cleaner
concrete to clean products
Another facility of Marine Travel
Lift handles hazardous waste.
All drums in this area
are product
1336. PBI Warehouse W5
is an area where they
have fiberglass molds
setup. Use the
cut sheets and
assemble on molds
using epoxy & polyester resin.
Dioctyl phthalate is used for a
Dye conditioner / plasticizer for
hoses & products.

[signature]

1334. Wastes generated at W-3 are Dibasic ester of ? (DBE)
Acetone & methylene chloride
Some residual resins from cleanout of gum (resin) in methylene chloride
VOC emission air permit
1 Drum MeCl$_2$
1 Drum Dioctyl Phosphate
1 Drum M-Pyrol
1 Drum Non hazardous DBE
1342 PIC 6 (NW) taken of summary for the above four drums located in NW corner of bldg, W-5.
Methylene chloride has a generator accumulation start date of 10-15-91. the drum is full. Dioctyl

D. Whitman

phthalate has generator accumulation start date of 3-28-91.
Concrete floor w/ sheet metal sided bldg. No floor drains at this location
1352 PIC 7 Picture (SE) of burned wood pile. Current practice is to haul all wood directly to landfill. No liners on soil/gravel.
1353 PIC 8 of raw material storage yard covers about 10-12 acres (outside "bone yard")
1355 PIC 9 SW exposure of Wood Ash pile + storage of raw material
Storm water flows North + Northeast

D. Whitman

1415 END PA/VSI, Checked w/ facility representatives on other questions they would have. They had none!

Kurt W Whitmore 4-22-92

Kurt C. W Whitmore 4-24-92